

Hearing Date and Time: January 3, 2024 at 10:00 A.M. (ET)
Objection Deadline: December 21, 2023 at 4:00 P.M. (ET)

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*Counsel to the Debtors
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**THIS OBJECTION SEEKS TO MODIFY AND ALLOW AS MODIFIED
CERTAIN FILED PROOFS OF CLAIM**

**PLEASE CAREFULLY REVIEW THE
ATTACHED OBJECTION AND THE ATTACHMENTS
THERETO TO DETERMINE WHETHER IT AFFECTS YOUR CLAIM(S)**

**IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL:
DEANDRA FIKE, ESQ., DFIKE@CGSH.COM OR KATHARINE ROSS, ESQ.,
KROSS@CGSH.COM**

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

**NOTICE OF HEARING ON
DEBTORS' SEVENTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) TO
CERTAIN CLAIMS PURSUANT TO 11 U.S.C. § 502
AND FED. R. BANKR. P. 3007 (MODIFY AND ALLOW AS MODIFIED)**

PLEASE TAKE NOTICE that on January 19, 2023 (the “Petition Date”), Genesis Global Holdco, LLC (“Holdco”) and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”),² each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that on November 29, 2023 the Debtors filed the *Debtors’ Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Modify and Allow As Modified)* (the “Seventh Omnibus Objection”). A hearing (the “Hearing”) on the Seventh Omnibus Objection will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10610 pursuant to the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 44) (the “Case Management Order”) and to the *Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 (I) Establishing Claims Objection and Notice Procedures, (II) Establishing Claim Hearing Procedures and (III) Granting Related Relief* (ECF No. 498) (the “Claims Procedures Order”). The Hearing will commence on **January 3, 2024, at 10:00 A.M. (Prevailing Eastern Time)**, and will be conducted through zoom for government. Pursuant to the Claims Procedures Order, the Debtors reserve the right to adjourn the Hearing in their sole discretion on further notice. Claims Procedures Order at 3.

PLEASE TAKE FURTHER NOTICE that parties wishing to register for the Zoom hearing should use the eCourt Appearances link on the Court’s website: <https://www.nysb.uscourts.gov/ecourt-appearances>. After the deadline to make appearances passes, the Court will circulate by email prior to the Hearing the Zoom links to those persons who made eCourt Appearances, using the email addresses submitted with those appearances. Members of the public who wish to listen to, but not participate in, the Hearing free of charge may do so by calling the following muted, listen-only number: 1-929-205-6099, Access Code: 92353761344#.

PLEASE TAKE FURTHER NOTICE that any objections or responses (“Responses”), if any, to the Seventh Omnibus Objection or the relief requested therein shall be made in writing, filed with the Court no later than **December 21, 2023, at 4:00 P.M. (Prevailing Eastern Time)** (the “Response Deadline”), and served as required by the Case Management Order.

PLEASE TAKE FURTHER NOTICE that if no Responses are timely filed and served with respect to the Seventh Omnibus Objection, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form annexed as Exhibit

² Holdco, and its Debtor and non-Debtor subsidiaries are collectively referred to as the “Company”.

A to the Seventh Omnibus Objection, which order the Court may enter with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE copies of the Seventh Omnibus Objection can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or (ii) from the Debtors' notice and claims agent, Kroll Restructuring Administration located at One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, New York 10165, at <https://restructuring.ra.kroll.com/genesis> or by calling +1 212 257 5450. Note that a PACER password is needed to access documents on the Court's website.

PLEASE TAKE FURTHER NOTICE that the Hearing may affect your rights. Please read the Seventh Omnibus Objection carefully and, if you have one available, discuss it with your attorney. (If you do not have an attorney, you should consider consulting with one.)

PLEASE TAKE FURTHER NOTICE that if you oppose the relief requested in the Seventh Omnibus Objection, or if you want the Court to hear your position on the Seventh Omnibus Objection, then you or your attorney must attend the Hearing. If you or your attorney do not follow the foregoing steps, the Court may decide that you do not oppose the relief requested in the Seventh Omnibus Objection and may enter orders granting the relief requested by the Debtors.

Dated: November 29, 2023
New York, New York

/s/ Luke A. Barefoot
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*Counsel to the Debtors
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DEBTORS' SEVENTH OMNIBUS OBJECTION
(NON-SUBSTANTIVE) TO CERTAIN CLAIMS PURSUANT TO
11 U.S.C. § 502 AND FED. R. BANKR. P. 3007 (MODIFY AND ALLOW AS MODIFIED)**

**TO THE CLAIMANTS WHOSE CLAIMS ARE OBJECTED TO BY THIS
OBJECTION (THE “SEVENTH OMNIBUS OBJECTION” OR “OBJECTION”):**

- THIS OBJECTION SEEKS TO MODIFY AND ALLOW AS MODIFIED CERTAIN FILED PROOFS OF CLAIM.**
- YOU SHOULD LOCATE YOUR CLAIM(S) ON EXHIBITS 1 AND 2 TO THE PROPOSED ORDER.**
- YOUR RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTION(S) THAT MAY BE FILED BY THE DEBTORS. YOUR CLAIM(S) MAY BE MODIFIED, REDUCED, OR OTHERWISE**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

AFFECTED AS A RESULT OF THIS OBJECTION. THEREFORE, PLEASE READ THIS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

- THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS' RIGHTS, CONSISTENT WITH PRIOR COURT ORDERS, TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS SUBJECT TO THIS OBJECTION.**

Genesis Global Holdco, LLC (“Holdco”) and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors,” and these cases, the “Chapter 11 Cases”) hereby object to and incorporate by reference those claims listed on Exhibit 1 and Exhibit 2 (together, the “Disputed Claims”) to the proposed order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), pursuant to section 502 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the *Revised Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 (I) Establishing Claims Objection and Notice Procedures, (II) Establishing Claim Hearing Procedures and (III) Granting Related Relief* (ECF No. 498) (the “Claims Objection Procedures Order”) and seek entry of the Proposed Order modifying and allowing as modified the Disputed Claims as set forth herein. In support of this Objection, the Debtors submit the *Declaration of Paul Kinealy in Support of the Debtors’ Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Modify and Allow As Modified)* (the “Kinealy Declaration”), attached hereto as Exhibit B and incorporated by reference, and respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the Southern

District of New York dated January 31, 2012 (Preska, C.J.). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory bases for the relief requested herein are Bankruptcy Code sections 105 and 502, and Bankruptcy Rule 3007.

BACKGROUND

A. Debtors' Business and Procedural History

2. Holdco (together with the other Debtors and Holdco's Non-Debtor Subsidiaries, the "Company") and its non-Debtor affiliate Genesis Global Trading, Inc. ("GGT") provide lending and borrowing, spot trading, derivatives and custody services for digital assets and fiat currency. The Debtors engaged in lending, borrowing and certain trading services, while the non-Debtor subsidiaries engage in derivatives, custody and most of the Company's trading services. Holdco is a sister company of GGT and 100% owned by Digital Currency Group, Inc. Additional information regarding the Debtors' business, capital structure and the circumstances leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of A. Derar Islim in Support of First Day Motions and in Compliance with Local Rule 1007-2* (ECF No. 17), the *Declaration of Paul Aronzon in Support of First Day Motions and Applications in Compliance with Local Rule 1007-2* (ECF No. 19) and the *Declaration of Michael Leto in Support of First Day Motions and Applications in Compliance with Local Rule 1007-2* (ECF No. 28) (together, the "First Day Declarations").²

3. On January 19, 2023, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the date of such filing, the "Petition Date") with the Court. The Debtors continue to operate their businesses and manage their properties as debtors-in-

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declarations.

possession under sections 1107(a) and 1108 of the Bankruptcy Code. The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and the *Order Directing Joint Administration of the Related Chapter 11 Cases* (ECF No. 37). No trustee or examiner has been appointed in the Chapter 11 Cases. On February 3, 2023, an official committee of unsecured creditors (the “Committee”) was appointed in the Chapter 11 Cases pursuant to the *Notice of Appointment of Official Committee of Unsecured Creditors* (ECF No. 55).

4. On March 21, 2023, each Debtor filed its *Summary of Assets and Liabilities* (ECF Nos. 145, 146, and 147) and *Statement of Financial Affairs* (ECF Nos. 142, 143 (as amended by ECF No. 450), and 144) (the “Schedules” and “Statements,” respectively).

5. On April 4, 2023, the Court granted the *Order (I) Establishing Bar Dates for Submitting Proofs of Claim, (II) Approving Proof of Claim Form, Bar Date Notices, and Mailing and Publication Procedures, (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims, and (IV) Providing Certain Supplemental Relief* (ECF No. 200) (the “Bar Date Order”), which established May 22, 2023 as the general date by which most creditors have submitted their proofs of claim (the “General Bar Date”).

6. The General Bar Date passed on May 22, 2023. As of November 27, 2023, 1,191 proofs of claim have been filed against the Debtors.

B. The Claims Resolution Process

7. In the ordinary course of business, the Debtors maintain books and records (the “Books and Records”) that reflect, among other things, the Debtors’ liabilities and the amounts owed to their creditors.

8. The Debtors’ Claims agent, Kroll Restructuring Administration (the “Claims Agent”), has prepared and maintains a register (the “Claims Register”) of proofs of claim (each a

“Proof of Claim”) that were filed in these Chapter 11 Cases asserting claims against the Debtors (collectively, the “Claims,” and each holder of a Claim, a “Claimant”). Pursuant to the *Stipulation and Confidentiality Agreement and Protective Order* (ECF No. 328) (the “Protective Order”), the Court’s *Memorandum of Decision* (ECF No. 581) (the “Redaction Decision”), and the *Order Granting the Debtors’ and the Official Committee of Unsecured Creditors’ Motions for Entry of an Order Requiring the Redaction of Certain Personally Identifiable Information* (ECF No. 694) (the “Redaction Order”), much of that information is maintained under seal to protect the confidentiality of the Debtors’ creditors. The Debtors and their advisors are comprehensively reviewing and reconciling all claims, including both the claims listed on the Schedules (“Scheduled Claims”) and the Claims asserted in the Proofs of Claim (including any supporting documents). The Debtors are also comparing the Claims asserted in the Proofs of Claim with their Books and Records to determine the validity of the asserted Claims.

9. The reconciliation process includes identifying particular categories of claims that may be targeted for disallowance, reduction and allowance or reclassification and allowance. To reduce the number of Claims, and to avoid possible double recovery or otherwise improper recovery by Claimants, as well as unnecessary duplication or noise in the voting pool in respect of the Debtors’ upcoming solicitation, the Debtors will continue to file omnibus objections to such categories of claims if and where warranted. This Objection is one such omnibus objection.

10. On July 12, 2023, the Court entered the Claims Objection Procedures Order granting the Debtors relief from certain requirements of Bankruptcy Rule 3007. The Debtors submit that this Objection and the notice provided to the Claimants in connection herewith are consistent with the Claims Objection Procedures Order, the Bankruptcy Code and the Bankruptcy Rules.

RELIEF REQUESTED

11. The Debtors and/or their advisors have reviewed the Claims Register, the Schedules, the Debtors' Books and Records, and each of the Disputed Claims. Based on this review, the Debtors have determined that each of the Disputed Claims is subject to modification on the following bases: (i) it has been asserted against an incorrect Debtor entity; and/or (ii) it has been asserted in an amount that is inconsistent with the Debtors' Schedules and Books and Records. By this Objection, the Debtors respectfully request that the Court enter the Proposed Order, pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, (i) modifying the Disputed Claims as set forth herein and (ii) allowing the Disputed Claims as modified.³

BASIS FOR RELIEF

12. When asserting a proof of claim against a bankruptcy estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Avaya, Inc.*, 608 B.R. 366, 369-70 (Bankr. S.D.N.Y. 2019). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *See id.* A party wishing to dispute such claim must produce evidence in sufficient force to negate the claim's *prima facie* validity. *Id.* Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.* The burden of persuasion is always on the claimant. *Id.*

³ Further, the Disputed Claims marked with an asterisk on Exhibits 1 and 2 to the Proposed Order were filed after the General Bar Date. Pursuant to section 502(b) of the Bankruptcy Code, a claimant's failure to timely file a proof of claim provides an additional, independent basis for disallowance of that claim. *See* 11 U.S.C. § 502(b). Bankruptcy Rule 3007 also expressly allows a debtor to file an omnibus objection to claims on the basis that "they were not timely filed." *See* Fed. R. Bankr. Pro. 3007. To the extent that the Disputed Claims were filed after the General Bar Date, such Claims are untimely and should also be disallowed and expunged on that basis. *See, e.g., In re Roman Catholic Diocese of Rockville Centre, New York*, Case No. 20-12345 (MG), 2023 WL 4497418, at *12 (Bankr. S.D.N.Y. July 1, 2023) (disallowing late-filed claims); *In re Ditech Holding Corp.*, Case No. 19-10412 (JLG), 2023 WL 3265089, at *15 (Bankr. S.D.N.Y. May 4, 2023) (same).

13. Section 502(b)(1) of the Bankruptcy Code provides that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007(d) and the Claims Objection Procedures Order permit the Debtors to file an objection to more than one claim on non-substantive bases, such as because such claims “duplicate other claims” (Fed. R. Bankr. P. 3007(d)(1)), are “inconsistent with or contradict[] the Debtors’ books and records[,]” “fail[] to sufficiently specify the basis for the claim[,]” or “assert[] amounts inconsistent with the terms of the applicable master lending agreement with such claimant.” Claims Objection Procedures Order ¶¶ 1(a)(i), (v), (xv).

14. Pursuant to the Claims Objections Procedures Order, the Debtors are permitted to file an omnibus objection to Claims for which “the amount claimed . . . is inconsistent with or contradicts the Debtors’ books and records and the Debtors . . . deny liability in excess of the amount reflected in the Debtors’ books and records” and that are “filed against the incorrect Debtor, a non-debtor, or [are] improperly filed against multiple Debtors.” Claims Objection Procedures Order, ¶ 1(a)(i), (viii). Doing so will ensure that the Claims Register is accurate and consistent with the Debtors’ Schedules and Books and Records. Failure to do so could result in improper or unwarranted creditor recoveries. For these reasons, courts in this district have granted similar relief. *See, e.g.*, Order, *In re LATAM Airlines Group S.A., et al.*, Case No. 20-11254 (JLG) (Bankr. S.D.N.Y. September 27, 2021) (ECF No. 3234) (modifying claims to identify correct debtor); Order, *In re Windstream Finance, Corp., et al.*, Case No. 19-22397 (RDD) (Bankr. S.D.N.Y. June 17, 2021) (ECF No. 130) (same).

OBJECTION

15. The Debtors and/or their advisors have reviewed the Claims Register, the Schedules, the Debtors’ Books and Records, and each of the Disputed Claims. *See Ex. B*, Kinealy

Decl., ¶ 4. Through this review, the Debtors have determined, with the help of Alvarez and Marsal North America LLC (“A&M”), the Debtors’ financial advisor, that: (i) the Disputed Claims identified in Exhibit 1 to the Proposed Order were both (a) asserted against the incorrect Debtor and (b) asserted in an amount unsupported by the Debtors’ Schedules and Books and Records (the “Modify Debtor and Amount Claims”); and (ii) the Disputed Claims identified in Exhibit 2 to the Proposed Order were asserted in an amount unsupported by the Debtors’ Schedules and Books and Records (the “Modify Amount Claims”). *See* Ex. B, Kinealy Decl., ¶¶ 5,7.

16. Notwithstanding these deficiencies, the Debtors have identified a Scheduled Claim with which each of the Disputed Claims corresponds and seek to modify the Disputed Claims to match the Debtors’ Schedules and Books and Records. *See* Ex. B, Kinealy Decl., ¶¶ 6,8. Further, because none of the Disputed Claims provided any evidence to support the specific Debtor against which the Disputed Claims asserted liability and/or evidence to support the amount of the asserted claim, the Disputed Claims fail to meet the standard for *prima facie* validity. The Debtors accordingly object to the Disputed Claims on the basis that they have been asserted against the incorrect Debtor and/or in an amount unsupported by the Debtors’ Schedules and Books and Records, and respectfully request that: (i) with respect to the Modify Debtor and Amount Claims identified in Exhibit 1 to the Proposed Order, such Claims be modified such that they are asserted against the correct Debtor and the amounts asserted in such claims be reduced to the amount reflected in the Debtors’ Schedules and Books and Records, as identified in Exhibit 1; (ii) with respect to the Modify Amount Claims identified in Exhibit 2 to the Proposed Order, the amounts asserted be reduced to the amount reflected in the Debtors’ Schedules and Books and Records, as

identified in Exhibit 2; and (iii) that the Disputed Claims be allowed as modified herein.⁴ *See Ex. B*, Kinealy Decl., ¶¶ 5-9.

SEPARATE CONTESTED MATTERS

17. To the extent that a response is filed regarding any Disputed Claim listed in this Objection and the Debtors are unable to resolve the response, such Disputed Claim and the Objection by the Debtors to such claim asserted herein shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection shall be deemed a separate order with respect to each Disputed Claim.

RESPONSES TO OMNIBUS OBJECTION

18. To contest this Objection, a Claimant must file and serve a written response to this Objection (a “Response”) so that it is received no later than **4:00 p.m.** (prevailing Eastern Time) on **December 21, 2023** (the “Response Deadline”). Every Response must be filed electronically with the Court on the docket of *In re Genesis Global Holdco, LLC*, Case No. 23-10063 (the “Docket”) and served upon the following entities so that the Response is received no later than the Response Deadline, at the following addresses:

Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, New York 10006
Attn: Sean O’Neal, Esq., Luke A. Barefoot, Esq., and Jane VanLare, Esq.
soneal@cgsh.com, lbarefoot@cgsh.com, and jvanlare@cgsh.com

-and-

Genesis Global Holdco, LLC

⁴ Pursuant to section 502(b) of the Bankruptcy Court, the Debtors have converted the amount in which the Disputed Claims should be allowed to U.S. Dollars as of the Petition Date. *See Hr’g Tr. at 48:1-13, In re Voyager Digital Holdings, Inc.*, No. 22-10943 (MEW) (Bankr. S.D.N.Y. Feb. 22, 2023) (noting that while the claimant’s proof of claim asserted a claim denominated in digital assets, “under the Bankruptcy Code, the value of your claim for purposes of distribution has to be measured in terms of dollars as of the filing date.”). The Debtors, however, reserve the right to make distributions with respect to the Disputed Claims in cash and/or crypto currency pursuant to the terms of any confirmed chapter 11 plan. For the avoidance of doubt, nothing herein shall determine the method of distributions pursuant to any such plan.

175 Greenwich St., 38th Fl.
New York, NY 10007
Attn: Arianna Pretto-Sakmann
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-and-

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-and-

Bankruptcy Court of the Southern District of New York
Chambers of Judge Sean H. Lane
300 Quarropas Street
White Plains, NY 10610
Attn: Chambers of Judge Sean H. Lane

19. Every Response to this Objection must contain, at minimum, the following information:

- a. A caption identifying the name of the Bankruptcy Court, the names of the Debtors, the case number and the title of the Objection to which the Response is directed;
- b. The name of the Claimant and description of the basis for the Claim;
- c. The specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;
- d. A short statement describing the reasons for which the Claim should not be disallowed as set forth in the Objection
- e. Additional documentation or other evidence upon which the Claimant relies in opposing the Objection (if it was not included with the Proof of Claim previously filed with the Court);
- f. The address(es) to which the Debtors must return any reply to the Response, if different from that presented in the Claimant's Proof of Claim; and
- g. The name, address, and telephone number of the person (which may be the Claimant or its legal representative) holding ultimate authority to resolve the Claim on the Claimant's behalf.

20. If a Claimant fails to file and serve a timely Response by the Response Deadline, the Debtors may present to the Court an appropriate order disallowing or modifying the Disputed Claim, without further notice to the Claimant or a hearing.

REPLIES TO RESPONSES

21. The Debtors may, at their option, file and serve a reply to any Response no later than two (2) business days prior to the Hearing.

ADJOURNMENT OF HEARING

22. The Debtors reserve the right to adjourn the Hearing on any Responses to this Objection. In the event that the Debtors notice such an adjournment, it will be noted on the notice of agenda for the Hearing, and such agenda will be served on the affected Claimants by serving the person designated in the Response.

RESERVATION OF RIGHTS

23. The Debtors expressly reserve the right to amend, modify or supplement this Objection. Should the grounds of objection stated in this Objection be dismissed or overruled, the Debtors reserve the right to object to each of the Disputed Claims on any other grounds that the Debtors discover or elect to pursue. This Objection sets out non-substantive objections to each of the Disputed Claims identified in Exhibit 1 and Exhibit 2 to the Proposed Order. The Debtors reserve their right to assert other non-substantive objections and/or one or more substantive objections to the Disputed Claims set forth on Exhibit 1 and Exhibit 2 at a later time, to the extent consistent with the Claims Objection Procedures Order.

24. Notwithstanding anything contained in this Objection or the attached exhibits, nothing herein shall be construed as a waiver of any rights that the Debtors may have to (a) commence avoidance actions under the applicable sections of the Bankruptcy Code, including, but

not limited to, sections 547 and 548 of the Bankruptcy Code, against the Claimants subject to this Objection, (b) enforce the Debtors' rights of setoff against the Claimants relating to such avoidance actions or (c) seek disallowance pursuant to Bankruptcy Code section 502(d) of each of the Claims of the Claimants that are subject to such avoidance actions.

NOTICE

25. The Debtors have provided notice of this Objection in accordance with the procedures set forth in the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 44) (the “Case Management Order”). The Debtors respectfully submit that no other or further notice need be provided.

NO PRIOR REQUEST

26. No prior request for the relief requested herein has been made to this or any other Court.

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CONCLUSION

WHEREFORE, for the reasons set forth herein the Debtors respectfully request that this Court (a) enter the Proposed Order and (b) grant such other and further relief as is just and proper.

Dated: November 29, 2023
New York, New York

/s/ Luke A. Barefoot
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*Counsel to the Debtors
and Debtors-in-Possession*

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER GRANTING DEBTORS' SEVENTH
OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO
CERTAIN CLAIMS PURSUANT TO 11 U.S.C. § 502 AND
FED. R. BANKR. P. 3007 (MODIFY AND ALLOW AS MODIFIED)**

Upon the *Debtors' Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Modify and Allow As Modified)* (the "Objection")² filed by the debtors in the above-captioned case (the "Debtors"), requesting entry of an order (the "Order") pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rule 3007 modifying and allowing as modified each of the Disputed Claims identified on Exhibit 1 and Exhibit 2 attached hereto; and upon the *Declaration of Paul Kinealy in Support of Debtors' Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Modify and Allow As Modified)*, attached to the Objection as Exhibit B; and upon all other documentation filed in connection with the Objection and the Disputed Claims; and adequate notice of the Objection having been given as set forth in the Objection; and it appearing that no other or further notice is required; and sufficient cause appearing therefor;

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable, are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

² Capitalized terms used, but not otherwise defined, herein shall have the meanings set forth in the Objection.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. For the reasons stated in the Objection, the Objection is GRANTED with respect to each of the Disputed Claims identified on Exhibit 1 and Exhibit 2 attached hereto.
2. Each of the Disputed Claims identified in Exhibit 1 is hereby (i) modified to be asserted against the correct Debtor identified in Exhibit 1 and (ii) reduced to the amount identified on Exhibit 1.
3. Each of the Disputed Claims identified in Exhibit 2 is hereby reduced to the amount identified in Exhibit 2.
4. Each of the Disputed Claims is hereby allowed as modified in the amount identified in Exhibit 1 and Exhibit 2.
5. For the avoidance of doubt, nothing in this Order shall govern or determine the method or currency of any distribution on any claim, which will be determined pursuant to the terms of a confirmed plan of reorganization.
6. This Order shall be deemed a separate Order with respect to each of the Disputed Claims identified on Exhibit 1 and Exhibit 2. Any appeal and/or stay of this Order pending appeal by any Claimants whose Claims are subject to this Order shall only apply to the contested matter which involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.
7. The Debtors, the Debtors' claims agent, Kroll Restructuring Administration LLC, and the clerk of this Court are authorized to take all actions necessary and appropriate to give effect to this Order, including updating the Claims Register to reflect the relief granted herein.
8. Except as provided in this Order, nothing in this Order shall be deemed (i) an admission or finding as to the validity of any Claim against a Debtor, (ii) a waiver of the right of

the Debtors to dispute any Claim against any Debtor on any grounds whatsoever at a later date, (iii) a promise by or requirement on any Debtor to pay any Claim, or (iv) a waiver of the rights of the Debtors under the Bankruptcy Code or any other applicable law.

9. This Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

Dated: _____, 2023
New York, New York

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Modify Debtor and Amount Claims

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 1 - Modify Debtor and Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
1 NAME REDACTED ADDRESS REDACTED	18 Genesis Global Holdco, LLC	02/22/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 0.00			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	FIL 19,000.00 USD 100,453.00			Unsecured	FIL 19,022,3835616438 USD 1,534,35003662109
					Subtotal In Kind Amount	FIL 19,000.00 USD 100,453.00			Subtotal In Kind Amount	FIL 19,022,3835616438 USD 1,534,35003662109
									Subtotal Pro Forma Amount	USD 85,213.82
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
2 NAME REDACTED ADDRESS REDACTED	379 Genesis Global Holdco, LLC	05/22/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 0.00			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	USD 3,179,068.49			Unsecured	USD 3,050,657,52684878
					Subtotal In Kind Amount	USD 3,179,068.49			Subtotal In Kind Amount	USD 3,050,657,52684878
									Subtotal Pro Forma Amount	USD 3,050,657.53
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
3 NAME REDACTED ADDRESS REDACTED	479 Genesis Global Holdco, LLC	05/22/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 0.00			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	BTC 0.003 USD 82.43			Unsecured	BTC 0.00308969463758466
					Subtotal In Kind Amount	BTC 0.003 USD 82.43			Subtotal In Kind Amount	BTC 0.00308969463758466
									Subtotal Pro Forma Amount	USD 65.17
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
4 NAME REDACTED ADDRESS REDACTED	636 Genesis Global Holdco, LLC	06/01/2023*			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 36,313.34			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	USDC 36,313.34			Unsecured	USDC 36,313.3364133271
					Subtotal In Kind Amount	USD 36,313.34 USDC 36,313.34			Subtotal In Kind Amount	USDC 36,313.3364133271
									Subtotal Pro Forma Amount	USD 36,368.17
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 1 - Modify Debtor and Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>		
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS
5 NAME REDACTED ADDRESS REDACTED	258 NAME REDACTED ADDRESS REDACTED	05/15/23 04/14/23	Genesis Global Holdco, LLC Genesis Global Holdco, LLC	05/15/23 04/14/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 BTC 0.00077787938523252 USD 16.39	Genesis Global Capital, LLC Genesis Global Capital, LLC Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured Subtotal In Kind Amount Subtotal Pro Forma Amount	USD 0.00 USD 0.00 USD 0.00 BTC 0.00077787938523252 USD 16.41
						USD 0.00			USD 0.00
						USD 0.00			USD 0.00
						USD 0.00			USD 0.00
						ADA 875,742.1954 BTC 80,41379498 ETH 865.7365259 SHIB 3,100,000,000.00 USD 4,803,066.19 USDC 1,420,075.31			ADA 890,209,93613961 BTC 81,1254019763267 ETH 870.551444048544 SHIB 3,103,652,054,79452 USD 1,928,08943494711 USDC 1,441,869,15267487
						Subtotal In Kind Amount			Subtotal In Kind Amount
						ADA 875,742.1954 BTC 80,41379498 ETH 865.7365259 SHIB 3,100,000,000.00 USD 4,803,066.19 USDC 1,420,075.31			ADA 890,209,93613961 BTC 81,1254019763267 ETH 870.551444048544 SHIB 3,103,652,054,79452 USD 1,928,08943494711 USDC 1,441,869,15267487
						Subtotal In Kind Amount			Subtotal Pro Forma Amount
						USD 0.00			USD 4,848,301.87
						USD 0.00			
6 NAME REDACTED ADDRESS REDACTED	78 NAME REDACTED ADDRESS REDACTED	04/14/23 05/22/23	Genesis Global Holdco, LLC Genesis Global Holdco, LLC	04/14/23 05/22/23	503(b)(9) Admin Priority Secured Unsecured	ADA 875,742.1954 BTC 80,41379498 ETH 865.7365259 SHIB 3,100,000,000.00 USD 4,803,066.19 USDC 1,420,075.31	Genesis Global Capital, LLC Genesis Global Capital, LLC Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured Subtotal In Kind Amount Subtotal Pro Forma Amount	ADA 890,209,93613961 BTC 81,1254019763267 ETH 870.551444048544 SHIB 3,103,652,054,79452 USD 1,928,08943494711 USDC 1,441,869,15267487
						Subtotal In Kind Amount			Subtotal In Kind Amount
						ADA 875,742.1954 BTC 80,41379498 ETH 865.7365259 SHIB 3,100,000,000.00 USD 4,803,066.19 USDC 1,420,075.31			ADA 890,209,93613961 BTC 81,1254019763267 ETH 870.551444048544 SHIB 3,103,652,054,79452 USD 1,928,08943494711 USDC 1,441,869,15267487
						Subtotal In Kind Amount			Subtotal Pro Forma Amount
						USD 0.00			USD 4,848,301.87
						USD 0.00			
						USD 0.00			
						USD 0.00			
						USD 0.00			
						USD 0.00			
7 NAME REDACTED ADDRESS REDACTED	531 NAME REDACTED ADDRESS REDACTED	05/22/23 05/22/23	Genesis Global Holdco, LLC Genesis Global Holdco, LLC	05/22/23 05/22/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148	Genesis Global Capital, LLC Genesis Global Capital, LLC Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured Subtotal In Kind Amount Subtotal Pro Forma Amount	USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148
						USD 0.00 USD 10.70 USD 0.00 BTC 0.000394501183771148			USD 0.00 USD 0.00 USD 0.00 BTC 0.000394501183771148

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 1 - Modify Debtor and Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
8 NAME REDACTED ADDRESS REDACTED	9 NAME REDACTED ADDRESS REDACTED	169 NAME REDACTED ADDRESS REDACTED	306 NAME REDACTED ADDRESS REDACTED	287 NAME REDACTED ADDRESS REDACTED	503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00	
					Admin	USD 0.00		Admin	USD 0.00	
					Priority	USD 0.00		Priority	USD 0.00	
					Secured	USD 0.00		Secured	USD 0.00	
					Unsecured	BTC 3,043.56 USD 64,178,945.24		Unsecured	BTC 3,047,641,519,899.02 USD 64,280,793.98	
					Subtotal In Kind Amount	BTC 3,043.56 USD 64,178,945.24		Subtotal In Kind Amount	BTC 3,047,641,519,899.02	
								Subtotal Pro Forma Amount	USD 64,280,793.98	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
9 NAME REDACTED ADDRESS REDACTED	169 NAME REDACTED ADDRESS REDACTED	306 NAME REDACTED ADDRESS REDACTED	287 NAME REDACTED ADDRESS REDACTED	306 NAME REDACTED ADDRESS REDACTED	503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00	
					Admin	USD 0.00		Admin	USD 0.00	
					Priority	USD 0.00		Priority	USD 0.00	
					Secured	USD 0.00		Secured	USD 0.00	
					Unsecured	BTC 0.43 USD 12,353.65		Unsecured	BTC 0.437,155,547,544,284 USD 9,220.48	
					Subtotal In Kind Amount	BTC 0.43 USD 12,353.65		Subtotal In Kind Amount	BTC 0.437,155,547,544,284	
								Subtotal Pro Forma Amount	USD 9,220.48	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
10 NAME REDACTED ADDRESS REDACTED	169 NAME REDACTED ADDRESS REDACTED	306 NAME REDACTED ADDRESS REDACTED	287 NAME REDACTED ADDRESS REDACTED	306 NAME REDACTED ADDRESS REDACTED	503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00	
					Admin	USD 0.00		Admin	USD 0.00	
					Priority	USD 0.00		Priority	USD 0.00	
					Secured	USD 0.00		Secured	USD 0.00	
					Unsecured	USD 164.03 USDC 164,025,505,999,096		Unsecured	USDC 164,025,505,999,096	
					Subtotal In Kind Amount	USD 164.03 USDC 164,025,505,999,096		Subtotal In Kind Amount	USDC 164,025,505,999,096	
								Subtotal Pro Forma Amount	USD 164.27	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
11 NAME REDACTED ADDRESS REDACTED	169 NAME REDACTED ADDRESS REDACTED	306 NAME REDACTED ADDRESS REDACTED	287 NAME REDACTED ADDRESS REDACTED	306 NAME REDACTED ADDRESS REDACTED	503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00	
					Admin	USD 0.00		Admin	USD 0.00	
					Priority	USD 0.00		Priority	USD 0.00	
					Secured	USD 0.00		Secured	USD 0.00	
					Unsecured	BTC 0.00347963 USD 73.43		Unsecured	BTC 0.003506579,290,414,67	
					Subtotal In Kind Amount	BTC 0.00347963 USD 73.43		Subtotal In Kind Amount	BTC 0.003506579,290,414,67	
								Subtotal Pro Forma Amount	USD 73.96	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 1 - Modify Debtor and Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
12 NAME REDACTED ADDRESS REDACTED	200 Genesis Global Holdco, LLC	05/07/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 0.00			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	BTC 0.00088 USD 25.56			Unsecured	BTC 0.000888208385219384 BTC 0.000888208385219384
					Subtotal In Kind Amount	BTC 0.000888 USD 25.56			Subtotal In Kind Amount	BTC 0.000888208385219384 USD 18.73
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
13 NAME REDACTED ADDRESS REDACTED	396 Genesis Global Holdco, LLC	05/21/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 0.00			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	USD 40.15 USDC 40.15			Unsecured	USDC 40.9289309169965
					Subtotal In Kind Amount	USD 40.15 USDC 40.15			Subtotal In Kind Amount	USD 40.9289309169965
									Subtotal Pro Forma Amount	USD 40.99
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
14 NAME REDACTED ADDRESS REDACTED	247 Genesis Global Holdco, LLC	05/12/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 0.00			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	USD 210.84 USDC 210.84			Unsecured	USDC 214.986967802491
					Subtotal In Kind Amount	USD 210.84 USDC 210.84			Subtotal In Kind Amount	USDC 214.986967802491
									Subtotal Pro Forma Amount	USD 215.31
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										
15 NAME REDACTED ADDRESS REDACTED	7 Genesis Global Holdco, LLC	02/06/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC		503(b)(9)	USD 0.00
					Admin	USD 0.00			Admin	USD 0.00
					Priority	USD 0.00			Priority	USD 0.00
					Secured	USD 0.00			Secured	USD 0.00
					Unsecured	SOL 66.00 USD 35,711.11			Unsecured	ETHW 66.2471581925614 SOL 1,411,89499256039 USD 339,57999420166
					Subtotal In Kind Amount	SOL 66.00 USD 35,711.11			Subtotal In Kind Amount	ETHW 66.2471581925614 SOL 1,411,89499256039 USD 339,57999420166
									Subtotal Pro Forma Amount	USD 30,639.09
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>										

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 1 - Modify Debtor and Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>		
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS
16 NAME REDACTED ADDRESS REDACTED	15 NAME REDACTED ADDRESS REDACTED	15 NAME REDACTED ADDRESS REDACTED	Genesis Global Holdco, LLC NAME REDACTED ADDRESS REDACTED	02/13/23 NAME REDACTED ADDRESS REDACTED	<i>503(b)(9)</i> <i>Admin</i> <i>Priority</i> <i>Secured</i> <i>Unsecured</i>	USD 0.00 USD 0.00 USD 0.00 USD 4,700.00	Genesis Global Capital, LLC NAME REDACTED ADDRESS REDACTED	<i>503(b)(9)</i> <i>Admin</i> <i>Priority</i> <i>Secured</i> <i>Unsecured</i>	USD 0.00 USD 0.00 USD 0.00 USDC 10.0920672573608
						Subtotal In Kind Amount USD 4,700.00		Subtotal In Kind Amount USDC 10.0920672573608	
								Subtotal Pro Forma Amount USD 10.11	
17 NAME REDACTED ADDRESS REDACTED	161 NAME REDACTED ADDRESS REDACTED	161 NAME REDACTED ADDRESS REDACTED	Genesis Global Holdco, LLC NAME REDACTED ADDRESS REDACTED	05/01/23 NAME REDACTED ADDRESS REDACTED	<i>503(b)(9)</i> <i>Admin</i> <i>Priority</i> <i>Secured</i> <i>Unsecured</i>	USD 0.00 USD 0.00 USD 0.00 USD 0.00	Genesis Global Capital, LLC NAME REDACTED ADDRESS REDACTED	<i>503(b)(9)</i> <i>Admin</i> <i>Priority</i> <i>Secured</i> <i>Unsecured</i>	USD 0.00 USD 0.00 USD 0.00 USDC 40.9289309169965
						Subtotal In Kind Amount USD 0.00		Subtotal In Kind Amount USDC 40.9289309169965	
								Subtotal Pro Forma Amount USD 40.99	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provide sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>									

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 1 - Modify Debtor and Amount

<u>ASSERTED CLAIMS</u>						<u>MODIFIED AND ALLOWED CLAIMS</u>								
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS					
18 NAME REDACTED ADDRESS REDACTED	144 Genesis Global Holdco, LLC	04/25/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00					
					Admin	USD 0.00		Admin	USD 0.00					
					Priority	USD 100,256.16		Priority	USD 0.00					
					Secured	USD 0.00		Secured	USD 0.00					
					Unsecured	USDC 100,256.16		Unsecured	USDC 101,363.10230636					
					Subtotal In Kind Amount			Subtotal In Kind Amount	USDC 101,363.10230636					
					USD 100,256.16			Subtotal Pro Forma Amount	USD 101,516.16					
					USDC 100,256.16									
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>														
19 NAME REDACTED ADDRESS REDACTED	103 Genesis Global Holdco, LLC	04/15/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00					
					Admin	USD 0.00		Admin	USD 0.00					
					Priority	USD 0.00		Priority	USD 0.00					
					Secured	USD 0.00		Secured	USD 0.00					
					Unsecured	USD 2,906,134.89 USDC 2,906,134.89		Unsecured	USDC 2,957,330.63555061					
					Subtotal In Kind Amount			Subtotal In Kind Amount	USDC 2,957,330.63555061					
					USD 2,906,134.89			Subtotal Pro Forma Amount	USD 2,961,796.20					
					USDC 2,906,134.89									
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>														
20 NAME REDACTED ADDRESS REDACTED	319 Genesis Global Holdco, LLC	05/18/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00					
					Admin	USD 0.00		Admin	USD 0.00					
					Priority	USD 0.00		Priority	USD 0.00					
					Secured	USD 0.00		Secured	USD 0.00					
					Unsecured	SOL 4,725.90 USD 160,397.00		Unsecured	SOL 4,804.2286726293					
					Subtotal In Kind Amount			Subtotal In Kind Amount	SOL 4,804.2286726293					
					USD 160,397.00			Subtotal Pro Forma Amount	USD 102,233.99					
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>														
21 NAME REDACTED ADDRESS REDACTED	165 Genesis Global Holdco, LLC	04/28/23			503(b)(9)	USD 0.00	Genesis Global Capital, LLC	503(b)(9)	USD 0.00					
					Admin	USD 0.00		Admin	USD 0.00					
					Priority	USD 0.00		Priority	USD 0.00					
					Secured	USD 0.00		Secured	USD 0.00					
					Unsecured	USD 4,978.19		Unsecured	BTC 0.166000813067996					
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts. Furthermore, the liability should properly be asserted against Genesis Global Capital, LLC.</i>														
<i>*Claim was filed after the General Bar Date</i>														

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

EXHIBIT 2

Modify Amount Claims

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
1	NAME REDACTED ADDRESS REDACTED	428	Genesis Global Capital, LLC	05/22/23	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 DOGE 4,147,519.29134426 USD 338,649.95	Genesis Global Capital, LLC	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 DOGE 4,147,519.29134426	
					Subtotal In Kind Amount	DOGE 4,147,519.29134426 USD 338,649.95		Subtotal In Kind Amount	DOGE 4,147,519.29134426	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
2	NAME REDACTED ADDRESS REDACTED	186	Genesis Global Capital, LLC	05/05/23	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 ATOM 18,221,57434402 USD 200,072.89	Genesis Global Capital, LLC	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 ATOM 18,390,8103341051	
					Subtotal In Kind Amount	ATOM 18,221,57434402 USD 200,072.89		Subtotal In Kind Amount	ATOM 18,390,8103341051	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
3	NAME REDACTED ADDRESS REDACTED	215	Genesis Global Capital, LLC	05/05/23	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 BTC 0.00057 USD 16.64	Genesis Global Capital, LLC	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 BTC 0.000575552861646924	
					Subtotal In Kind Amount	BTC 0.00057 USD 16.64		Subtotal In Kind Amount	BTC 0.000575552861646924	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
4	NAME REDACTED ADDRESS REDACTED	326	Genesis Global Capital, LLC	05/18/23	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 318,382.38 USD 0.00 USD 12,739,413.53	Genesis Global Capital, LLC	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 12,747,300.528628	
					Subtotal In Kind Amount	USD 13,057,795.91		Subtotal In Kind Amount	USD 12,747,300.528628	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
5	NAME REDACTED ADDRESS REDACTED	456	Genesis Global Capital, LLC	05/22/23	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 BTC 0.01	Genesis Global Capital, LLC	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 BTC 0.00950592268510158	
					Subtotal In Kind Amount	BTC 0.01		Subtotal In Kind Amount	BTC 0.00950592268510158	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
6	NAME REDACTED ADDRESS REDACTED	301	Genesis Global Capital, LLC	05/17/23	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 BTC 61.1379240374375 ETH 250,475538090554	Genesis Global Capital, LLC	503(b)(9) <i>Admin</i> <i>Priority</i> <i>Secured</i> Unsecured	USD 0.00 USD 0.00 USD 0.00 BTC 61.1379240374375 ETH 250,475538090554	
					Subtotal In Kind Amount	ETHW 250,475538090554 USD 32,846,3997070312 USDC 54,140,1412447858		Subtotal In Kind Amount	ETHW 250,475538090554 USD 32,846,3997070312 USDC 54,140,1412447858	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>						<u>MODIFIED AND ALLOWED CLAIMS</u>					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS		MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
7	NAME REDACTED 7 ADDRESS REDACTED	302	Genesis Global Capital, LLC	05/17/23	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00115282 USD 30.82	Subtotal In Kind Amount BTC 0.00115282 USD 30.82		Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00116170811677403	Subtotal In Kind Amount BTC 0.00116170811677403	
	<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
8	NAME REDACTED 8 ADDRESS REDACTED	94	Genesis Global Capital, LLC	04/17/23	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured ETH 3.188085 GUSD 1,668.12 USD 6,891.30	Subtotal In Kind Amount ETH 3.188085 GUSD 1,668.12 USD 6,891.30		Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USDC 12.1059330232786	Subtotal In Kind Amount USDC 12.1059330232786	
	<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
9	NAME REDACTED 9 ADDRESS REDACTED	166	Genesis Global Capital, LLC	05/01/23	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00038095 USD 10.74	Subtotal In Kind Amount BTC 0.00038095 USD 10.74		Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.000383898790404647	Subtotal In Kind Amount BTC 0.000383898790404647	
	<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
10	NAME REDACTED 10 ADDRESS REDACTED	105	Genesis Global Capital, LLC	04/21/23	503(b)(9) Admin USD 0.00 Priority USD 9,965.96 Secured USD 0.00 Unsecured USDC 6.38604	Subtotal In Kind Amount USD 9,931.92 USDC 6.38604		Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USDC 20.464460454008	Subtotal In Kind Amount USDC 20.464460454008	
	<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
11	NAME REDACTED 11 ADDRESS REDACTED	137	Genesis Global Capital, LLC	04/25/23	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 8,562.00	Subtotal In Kind Amount USD 8,562.00		Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00737123982980847 USD 4,370.49337062595	Subtotal In Kind Amount BTC 0.00737123982980847 USD 4,370.49337062595	
	<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
12	NAME REDACTED 12 ADDRESS REDACTED	55	Genesis Global Capital, LLC	04/13/23	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured LUNC 351,937.50	Subtotal In Kind Amount LUNC 351,937.50		Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 0.00999999977648258	Subtotal In Kind Amount USD 0.00999999977648258	
	<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										

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*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
13	NAME REDACTED 13 ADDRESS REDACTED	333	Genesis Global Capital, LLC	05/19/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00344268 USD 104.16 USDC 10.64 Subtotal In Kind Amount USD 104.16 USD 10.64	Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00352266811567106 USDC 10.8449017308712 Subtotal In Kind Amount BTC 0.00352266811567106 USDC 10.8449017308712 Subtotal Pro Forma Amount USD 85.16	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
14	NAME REDACTED 14 ADDRESS REDACTED	435	Genesis Global Capital, LLC	05/22/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 297,191.49 Unsecured HNT 100,000.05 Subtotal In Kind Amount HNT 100,000.05 USD 297,191.49	Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured HNT 100,342.14 Subtotal In Kind Amount HNT 100,342.14 Subtotal Pro Forma Amount USD 298,979.44	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
15	NAME REDACTED 15 ADDRESS REDACTED	405	Genesis Global Capital, LLC	05/22/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured DOT 11,351,699.3276656 Subtotal In Kind Amount DOT 11,351,699.3276656	Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured DOT 6,313,027,55613159 Subtotal In Kind Amount DOT 6,313,027,55613159 Subtotal Pro Forma Amount USD 37,019,593.59	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
16	NAME REDACTED 16 ADDRESS REDACTED	495	Genesis Global Capital, LLC	05/22/23		503(b)(9) Admin USD 149,152.05 Priority USD 0.00 Secured USD 0.00 Unsecured USD 5,288,197.61 Subtotal In Kind Amount USD 5,437,349.66	Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 5,241,621,21105491 Subtotal In Kind Amount USD 5,241,621,21105491 Subtotal Pro Forma Amount USD 5,241,621.21	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
17	NAME REDACTED 17 ADDRESS REDACTED	404	Genesis Global Capital, LLC	05/22/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 62.46 Subtotal In Kind Amount USD 62.46	Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00233416869755721 Subtotal In Kind Amount BTC 0.00233416869755721 Subtotal Pro Forma Amount USD 49.23	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
18	NAME REDACTED 18 ADDRESS REDACTED	315	Genesis Global Capital, LLC	05/18/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured SOL 15,000.76 USD 324,016.35 Subtotal In Kind Amount SOL 15,000.76 USD 324,016.35	Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured SOL 15,248,5776071566 Subtotal In Kind Amount SOL 15,248,5776071566 Subtotal Pro Forma Amount USD 324,489.73	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										

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Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
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<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>																																																						
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS																																																				
19	NAME REDACTED 19 ADDRESS REDACTED	231	Genesis Asia Pacific Pte. Ltd. (Singapore)	05/11/23		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>BNB 11,000.10</td></tr> <tr><td></td><td>BTC 150.00</td></tr> <tr><td></td><td>DOT 50,000.00</td></tr> <tr><td></td><td>USD 8,250,253.00</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>BNB 11,000.10</td></tr> <tr><td></td><td>BTC 150.00</td></tr> <tr><td></td><td>DOT 50,000.00</td></tr> <tr><td></td><td>USD 8,250,253.00</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		BNB 11,000.10		BTC 150.00		DOT 50,000.00		USD 8,250,253.00	Subtotal In Kind Amount			BNB 11,000.10		BTC 150.00		DOT 50,000.00		USD 8,250,253.00	Genesis Asia Pacific Pte. Ltd. (Singapore)		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>BNB 11,249,6363774689</td></tr> <tr><td></td><td>BTC 151,30676713047</td></tr> <tr><td></td><td>DOT 51,175,3424661715</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>BNB 11,249,6363774689</td></tr> <tr><td></td><td>BTC 151,30676713047</td></tr> <tr><td></td><td>DOT 51,175,3424661715</td></tr> <tr><td colspan="2">Subtotal Pro Forma Amount</td></tr> <tr><td></td><td>USD 6,798,844.61</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		BNB 11,249,6363774689		BTC 151,30676713047		DOT 51,175,3424661715	Subtotal In Kind Amount			BNB 11,249,6363774689		BTC 151,30676713047		DOT 51,175,3424661715	Subtotal Pro Forma Amount			USD 6,798,844.61
503(b)(9)	USD 0.00																																																												
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<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>																																																													
20	NAME REDACTED 20 ADDRESS REDACTED	480	Genesis Global Capital, LLC	05/22/23		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured USD 285.62</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>USD 285.62</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured USD 285.62	Subtotal In Kind Amount			USD 285.62	Genesis Global Capital, LLC		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured BTC 0.0113196629137054</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>BTC 0.0113196629137054</td></tr> <tr><td colspan="2">Subtotal Pro Forma Amount</td></tr> <tr><td></td><td>USD 238.75</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured BTC 0.0113196629137054	Subtotal In Kind Amount			BTC 0.0113196629137054	Subtotal Pro Forma Amount			USD 238.75																				
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	USD 238.75																																																												
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>																																																													
21	NAME REDACTED 21 ADDRESS REDACTED	238	Genesis Global Capital, LLC	05/12/23		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured USD 294,903.03</td></tr> <tr><td></td><td>USDC 294,903.031092026</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>USD 294,903.03</td></tr> <tr><td></td><td>USDC 294,903.031092026</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured USD 294,903.03		USDC 294,903.031092026	Subtotal In Kind Amount			USD 294,903.03		USDC 294,903.031092026	Genesis Global Capital, LLC		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured USD 294,903.031092026</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>USD 294,903.031092026</td></tr> <tr><td colspan="2">Subtotal Pro Forma Amount</td></tr> <tr><td></td><td>USD 295,348.33</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured USD 294,903.031092026	Subtotal In Kind Amount			USD 294,903.031092026	Subtotal Pro Forma Amount			USD 295,348.33																
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<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>																																																													
22	NAME REDACTED 22 ADDRESS REDACTED	371	Genesis Global Capital, LLC	05/22/23		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured USD 91,723,811.71</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>USD 91,723,811.71</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured USD 91,723,811.71	Subtotal In Kind Amount			USD 91,723,811.71	Genesis Global Capital, LLC		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured USD 91,704,679,8660103</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>USD 91,704,679,8660103</td></tr> <tr><td colspan="2">Subtotal Pro Forma Amount</td></tr> <tr><td></td><td>USD 91,704,679.87</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured USD 91,704,679,8660103	Subtotal In Kind Amount			USD 91,704,679,8660103	Subtotal Pro Forma Amount			USD 91,704,679.87																				
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<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>																																																													
23	NAME REDACTED 23 ADDRESS REDACTED	202	Genesis Global Capital, LLC	05/06/23		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured USD 14,064.07</td></tr> <tr><td></td><td>USDC 14,064.0701010365</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>USD 14,064.07</td></tr> <tr><td></td><td>USDC 14,064.0701010365</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured USD 14,064.07		USDC 14,064.0701010365	Subtotal In Kind Amount			USD 14,064.07		USDC 14,064.0701010365	Genesis Global Capital, LLC		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured USD 14,064.0701010365</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>USD 14,064.0701010365</td></tr> <tr><td colspan="2">Subtotal Pro Forma Amount</td></tr> <tr><td></td><td>USD 14,085.31</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured USD 14,064.0701010365	Subtotal In Kind Amount			USD 14,064.0701010365	Subtotal Pro Forma Amount			USD 14,085.31																
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<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>																																																													
24	NAME REDACTED 24 ADDRESS REDACTED	227	Genesis Global Capital, LLC	05/11/23		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured BTC 0.01</td></tr> <tr><td></td><td>USD 252.00</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>BTC 0.01</td></tr> <tr><td></td><td>USD 252.00</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured BTC 0.01		USD 252.00	Subtotal In Kind Amount			BTC 0.01		USD 252.00	Genesis Global Capital, LLC		<table border="1"> <tr><td>503(b)(9)</td><td>USD 0.00</td></tr> <tr><td>Admin</td><td>USD 0.00</td></tr> <tr><td>Priority</td><td>USD 0.00</td></tr> <tr><td>Secured</td><td>USD 0.00</td></tr> <tr><td></td><td>Unsecured BTC 0.00935039548415021</td></tr> <tr><td colspan="2">Subtotal In Kind Amount</td></tr> <tr><td></td><td>BTC 0.00935039548415021</td></tr> <tr><td colspan="2">Subtotal Pro Forma Amount</td></tr> <tr><td></td><td>USD 197.22</td></tr> </table>	503(b)(9)	USD 0.00	Admin	USD 0.00	Priority	USD 0.00	Secured	USD 0.00		Unsecured BTC 0.00935039548415021	Subtotal In Kind Amount			BTC 0.00935039548415021	Subtotal Pro Forma Amount			USD 197.22																
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†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>						<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS
25	NAME REDACTED ADDRESS REDACTED	458	Genesis Global Capital, LLC	05/22/23		503(b)(9) Admin USD 157,179.35 Priority USD 0.00 Secured USD 0.00 Unsecured USD 5,290,982.26 Subtotal In Kind Amount USD 5,448,161.61	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 5,127,058,56357159 Subtotal In Kind Amount USD 5,127,058,56357159 Subtotal Pro Forma Amount USD 5,127,058.56	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									
26	NAME REDACTED ADDRESS REDACTED	462	Genesis Global Capital, LLC	05/22/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.00652562 USD 326.79 Subtotal In Kind Amount BTC 0.00652562 USD 326.79	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.0156047322103891 Subtotal In Kind Amount BTC 0.0156047322103891 Subtotal Pro Forma Amount USD 329.13	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									
27	NAME REDACTED ADDRESS REDACTED	283	Genesis Global Capital, LLC	05/16/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.000037 USD 10.29 Subtotal In Kind Amount BTC 0.000037 USD 10.29	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.000383898790404647 Subtotal In Kind Amount BTC 0.000383898790404647 Subtotal Pro Forma Amount USD 8.10	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									
28	NAME REDACTED ADDRESS REDACTED	164	Genesis Global Capital, LLC	05/01/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 1.22745880173954 ETH 7.94649903285453 ETHW 7.88359150211811 GUSD 20,921,1304111948 USD 100,876,984464602 USDC 205,205327521798 Subtotal In Kind Amount BTC 1.22745880173954 ETH 7.94649903285453 ETHW 7.88359150211811 GUSD 20,921,1304111948 USD 100,876,984464602 USDC 205,205327521798	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 1.22745880173954 ETH 7.94649903285453 ETHW 7.88359150211811 GUSD 20,921,1304111948 USD 21,293,294464602 USDC 205,205327521798 Subtotal In Kind Amount BTC 1.22745880173954 ETH 7.94649903285453 ETHW 7.88359150211811 GUSD 20,921,1304111948 USD 21,293,294464602 USDC 205,205327521798 Subtotal Pro Forma Amount USD 80,693.77	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									
29	NAME REDACTED ADDRESS REDACTED	189	Genesis Global Capital, LLC	05/05/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 31,318,361.61 USDT 30,064,273.97 Subtotal In Kind Amount USD 31,318,361.61 USDT 30,064,273.97	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 30,824,383,5751284 Subtotal In Kind Amount USD 30,824,383,5751284 Subtotal Pro Forma Amount USD 30,823,767.09	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									
30	NAME REDACTED ADDRESS REDACTED	395	Genesis Global Capital, LLC	05/22/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.28 Subtotal In Kind Amount BTC 0.28	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.279131349655717 Subtotal In Kind Amount BTC 0.279131349655717 Subtotal Pro Forma Amount USD 5,887.43	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									

†Indicates claim contains unliquidated and/or undetermined amounts

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Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
31	NAME REDACTED ADDRESS REDACTED	151	Genesis Global Capital, LLC	04/26/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 BTC 1.03 USD 28,997.50	Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 BTC 1.03435468632459	
					Subtotal In Kind Amount	BTC 1.03 USD 28,997.50		Subtotal In Kind Amount	BTC 1.03435468632459	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
32	NAME REDACTED ADDRESS REDACTED	307	Genesis Global Capital, LLC	05/17/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 10,061.96 USDC 10,060.00	Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 USDC 10,263.016798908	
					Subtotal In Kind Amount	USD 10,061.96 USDC 10,060.00		Subtotal In Kind Amount	USD 10,263.016798908	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
33	NAME REDACTED ADDRESS REDACTED	132	Genesis Global Capital, LLC	04/25/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 501,663.00	Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 USD 257,219,507083525	
					Subtotal In Kind Amount	USD 501,663.00		Subtotal In Kind Amount	USD 257,219,507083525	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
34	NAME REDACTED ADDRESS REDACTED	135	Genesis Global Capital, LLC	04/24/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 BTC 50.00 USD 1,157,872.44	Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 BTC 50,219,1780862131	
					Subtotal In Kind Amount	BTC 50.00 USD 1,157,872.44		Subtotal In Kind Amount	BTC 50,219,1780862131	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
35	NAME REDACTED ADDRESS REDACTED	46	Genesis Global Capital, LLC	03/22/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 USD 396,444.17	Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 USD 387,146,222331282	
					Subtotal In Kind Amount	USD 396,444.17		Subtotal In Kind Amount	USD 387,146,222331282	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
36	NAME REDACTED ADDRESS REDACTED	11	Genesis Global Capital, LLC	02/13/23	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 USD 492,332.22	Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 SHIB 19,134,821,916,7671	
					Subtotal In Kind Amount	USD 492,332.22		Subtotal In Kind Amount	SHIB 19,134,821,916,7671	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
37	NAME REDACTED ADDRESS REDACTED	1128	Genesis Global Capital, LLC	10/26/2023*	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 USD 2,109,682.66	Genesis Global Capital, LLC	503(b)(9) Admin Priority Secured Unsecured	USD 0.00 USD 0.00 USD 0.00 USD 0.00 USD 1,044,814,90948763	
					Subtotal In Kind Amount	USD 2,109,682.66		Subtotal In Kind Amount	USD 1,044,814,90948763	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

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Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>						<u>MODIFIED AND ALLOWED CLAIMS</u>					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS		MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
38	NAME REDACTED ADDRESS REDACTED	389	Genesis Global Capital, LLC	05/21/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.20 Subtotal In Kind Amount BTC 0.20 USD 5,000.00		Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.000383898790404647 Subtotal In Kind Amount BTC 0.000383898790404647 Subtotal Pro Forma Amount USD 8.10	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>											
39	NAME REDACTED ADDRESS REDACTED	312	Genesis Global Capital, LLC	05/17/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 3,378.92 Subtotal In Kind Amount USD 3,378.92 USD 3,378.92		Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 3,448.498787796 Subtotal In Kind Amount USD 3,448.498787796 Subtotal Pro Forma Amount USD 3,453.71	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>											
40	NAME REDACTED ADDRESS REDACTED	273	Genesis Global Capital, LLC	05/15/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 22,454.77 Subtotal In Kind Amount USD 22,454.77 USD 22,454.77		Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 22,919.7137776249 Subtotal In Kind Amount USD 22,919.7137776249 Subtotal Pro Forma Amount USD 22,954.32	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>											
41	NAME REDACTED ADDRESS REDACTED	195	Genesis Global Capital, LLC	05/08/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 41.25 Subtotal In Kind Amount USD 41.25 USD 41.25		Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 42.0502697255754 Subtotal In Kind Amount USD 42.0502697255754 Subtotal Pro Forma Amount USD 42.11	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>											
42	NAME REDACTED ADDRESS REDACTED	212	Genesis Global Capital, LLC	05/10/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 4,872.65 Subtotal In Kind Amount USD 4,872.65		Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 4,969.30477141632 Subtotal In Kind Amount USD 4,969.30477141632 Subtotal Pro Forma Amount USD 4,976.81	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>											
43	NAME REDACTED ADDRESS REDACTED	260	Genesis Global Capital, LLC	05/15/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.02689001012946 Subtotal In Kind Amount BTC 0.02689001012946 USD 567.48		Genesis Global Capital, LLC		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured BTC 0.0269216887715303 Subtotal In Kind Amount BTC 0.0269216887715303 USD 3,1199988555908 Subtotal Pro Forma Amount USD 570.95	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>											

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Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>							<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	
44	NAME REDACTED 44 ADDRESS REDACTED	493	Genesis Global Capital, LLC	05/22/23		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 109,547.05</p> <p>Unsecured SOL 630.72 USD 97,417.45</p> <p>Subtotal In Kind Amount SOL 630.72 USD 206,964.50</p>	Genesis Global Capital, LLC		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>ETHW 50,058904109589 SOL 611,443022346363 USD 99,368,7361176591</p> <p>Subtotal In Kind Amount SOL 611,443022346363 USD 99,368,7361176591</p> <p>Subtotal Pro Forma Amount USD 112,572.47</p>	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
45	NAME REDACTED 45 ADDRESS REDACTED	316	Genesis Global Capital, LLC	05/18/23		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured BTC 75,3706203504141 MANA 156,563,401664527 USD 1,093,28001464844 USDC 18,922,4627485429</p> <p>Subtotal In Kind Amount BTC 75,3706203504141 MANA 156,563,401664527 USD 1,093,28001464844 USDC 18,922,4627485429</p>	Genesis Global Capital, LLC		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured BTC 75,3706203504141 MANA 156,563,401664527 USD 546,640014648437 USDC 18,922,4627485429</p> <p>Subtotal In Kind Amount BTC 75,3706203504141 MANA 156,563,401664527 USD 546,640014648437 USDC 18,922,4627485429</p> <p>Subtotal Pro Forma Amount USD 1,710,212.34</p>	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
46	NAME REDACTED 46 ADDRESS REDACTED	229	Genesis Global Capital, LLC	05/11/23		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 300,000.00 Secured USD 0.00</p> <p>Unsecured FIL 51,010.55</p> <p>Subtotal In Kind Amount FIL 51,010.55 USD 300,000.00</p>	Genesis Global Capital, LLC		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured FIL 51,988,0491877153</p> <p>Subtotal In Kind Amount FIL 51,988,0491877153</p> <p>Subtotal Pro Forma Amount USD 228,695.43</p>	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
47	NAME REDACTED 47 ADDRESS REDACTED	188	Genesis Global Capital, LLC	05/05/23		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured BTC 0.00037353 USD 7.88</p> <p>Subtotal In Kind Amount BTC 0.00037353 USD 7.88</p>	Genesis Global Capital, LLC		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured BTC 0.00037641004904403</p> <p>Subtotal In Kind Amount BTC 0.00037641004904403</p> <p>Subtotal Pro Forma Amount USD 7.94</p>	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
48	NAME REDACTED 48 ADDRESS REDACTED	507	Genesis Global Capital, LLC	05/22/23		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured USD 5,000.00</p> <p>Subtotal In Kind Amount USD 5,000.00</p>	Genesis Global Capital, LLC		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured USDC 10,0920672573608</p> <p>Subtotal In Kind Amount USDC 10,0920672573608</p> <p>Subtotal Pro Forma Amount USD 10,11</p>	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										
49	NAME REDACTED 49 ADDRESS REDACTED	402	Genesis Asia Pacific Pte. Ltd. (Singapore)	05/22/23		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured USDC 17,075,824,887832</p> <p>Subtotal In Kind Amount USDC 17,075,824,887832</p>	Genesis Asia Pacific Pte. Ltd. (Singapore)		<p>503(b)(9) USD 0.00 Admin USD 0.00 Priority USD 0.00 Secured USD 0.00</p> <p>Unsecured USDC 10,187,945,2006635</p> <p>Subtotal In Kind Amount USDC 10,187,945,2006635</p> <p>Subtotal Pro Forma Amount USD 10,203,329.00</p>	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>										

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063
Seventh Omnibus Objection
Exhibit 2 - Modify Amount

<u>ASSERTED CLAIMS</u>						<u>MODIFIED AND ALLOWED CLAIMS</u>			
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS	MODIFIED DEBTOR	PRIORITY STATUS	ASSERTED IN KIND AMOUNTS
50 NAME REDACTED ADDRESS REDACTED		197	Genesis Global Capital, LLC	05/08/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 27,811.85 USDC 27,811.85 Subtotal In Kind Amount USD 27,811.85 USD 27,811.85	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured USD 28,454.1856611343 Subtotal In Kind Amount USDC 28,454.1856611343 Subtotal Pro Forma Amount USD 28,497.15	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									
51 NAME REDACTED ADDRESS REDACTED		6	Genesis Global Capital, LLC	02/02/23		503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured ETH 1,002.466 ETHW 1,512.042 USD 2,004,000.00 USDC 300,747.95 Subtotal In Kind Amount ETH 1,002.466 ETHW 1,512.042 USD 2,004,000.00 USDC 300,747.95	Genesis Global Capital, LLC	503(b)(9) Admin USD 0.00 Priority USD 0.00 Secured USD 0.00 Unsecured ETH 1,016,82985193122 ETHW 1,519,29201183743 USDC 305,716,466091351 Subtotal In Kind Amount ETH 1,016,82985193122 ETHW 1,519,29201183743 USDC 305,716,466091351 Subtotal Pro Forma Amount USD 1,892,826.71	
<i>Reason: The asserted amount is inconsistent with the Debtors' books and records and the claimant does not provides sufficient support for the additional amounts.</i>									

†Indicates claim contains unliquidated and/or undetermined amounts

*Claim was filed after the General Bar Date

EXHIBIT B

Paul Kinealy Declaration

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DECLARATION OF PAUL KINEALY
IN SUPPORT OF DEBTORS' SEVENTH
OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO
CERTAIN CLAIMS PURSUANT TO 11 U.S.C. § 502 AND
FED. R. BANKR. P. 3007 (MODIFY AND ALLOW AS MODIFIED)**

I, Paul Kinealy, make this declaration pursuant to 28 U.S.C. § 1746 and state as follows:

BACKGROUND

1. I am a Senior Director at Alvarez and Marsal North America, LLC (“A&M”), the financial advisor for the above-captioned Debtors.

2. In my capacity as Senior Director, I am authorized to submit this declaration in support of the *Debtor's Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Modify and Allow As Modified)* (the “Objection”).²

3. I am familiar with the Debtors’ day-to-day operations, financing arrangements, business affairs, Schedules and Books and Records and am responsible for overseeing the review and analysis of claims filed in the Debtors’ Chapter 11 Cases. All facts set forth herein are based on my personal knowledge, my review or the review of employees of A&M of the Claims and

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

² Capitalized terms used, but not otherwise defined, herein shall have the meanings set forth in the Objection.

other relevant documents or information provided by the Debtors' employees and advisors. If I were called upon to testify, I could and would competently testify to each of the facts set forth herein on that basis, including that I, or employees of A&M, personally reviewed the Disputed Claims identified on Exhibit 1 and Exhibit 2 to the Proposed Order as part of the claims reconciliations process in these Chapter 11 Cases.

FACTUAL BASIS OF OBJECTION

4. Either I or one or more of the Debtors' employees or advisors operating at A&M's direction have reviewed the Claims Register, the Schedules, the Debtors' Books and Records, each of the Disputed Claims identified on Exhibit 1 and Exhibit 2 to the Proposed Order and the facts and circumstances set forth in the Objection regarding such Claims.

5. We have determined that the Disputed Claims identified in Exhibit 1 to the Proposed Order (the "Modify Debtor and Amount Claims") were both (i) asserted against the incorrect Debtor and (ii) asserted in amounts inconsistent with the Schedules and Books and Records of the Debtors.

6. We have also determined that the liability reflected in the Modify Debtor and Amount Claims rests solely with a different Debtor and is supported by the Debtors' Schedules and Books and Records in a lower amount. Both the corrected Debtor and corrected amount are identified for each such Modify Debtor and Amount Claim in Exhibit 1 to the Proposed Order.

7. We have also determined that the Disputed Claims identified in Exhibit 2 to the Proposed Order (the "Modify Amount Claims") were asserted in amounts inconsistent with the Debtors' Schedules and Books and Records.

8. We have also determined that the liability reflected in the Modify Amount Claims identified in Exhibit 2 to the Proposed Order is supported by the Debtors' Schedules and Books and records in a lower amount, also identified in Exhibit 2 to the Proposed Order.

9. Finally, we have determined that the Disputed Claims, if asserted against the correct Debtor and in the correct amount, assert amounts consistent with a corresponding Scheduled Claim.

10. I submit that the facts and circumstances set forth in the Objection are true and accurate to the best of my knowledge, information and belief, and the Disputed Claims identified on Exhibit 1 and Exhibit 2 to the Proposed Order should be modified and allowed as modified.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on November 29, 2023

/s/ Paul Kinealy
Paul Kinealy